

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

PAIGE CARTER, Special Administrator of
the ESTATE OF KEVIN C. CARTER,
Deceased,

Plaintiff,

vs.

SCOTT FRAKES, Former Director of the
Nebraska Department of Correctional
Services, in his individual capacity, et al.,

Defendants.

Case No. 8:23-cv-485

**STIPULATED MOTION FOR
PROTECTIVE ORDERS**

The Plaintiff, Paige Carter, Special Administrator of the Estate of Kevin C. Carter, moves the Court to enter the Stipulated Protective Order attached hereto in accordance with NECivR 7.2. The protective order authorizes and specifies conditions for the disclosure and use of confidential documents and information in the discovery process. The protective order is justified by Fed. R. Civ. P. 26(c) and relevant confidentiality provisions of federal and state law. The protective order is necessary in order for the parties to obtain and disclose essential discovery. The Defendants Scott Frakes, Michele Wilhelm, Dr. Harbans Deol, Shelby Barragan-Lopez, Michael McCann, Charice Talley, Jeffery Reed, Douglas Heminger, Matt Heckman, Franklin Howard, and Kim McGill, through their counsel, do not object to the entry of the Stipulated Protective Order.

Dated November 7, 2024

PAIGE CARTER, Special Administrator of the
ESTATE OF KEVIN C. CARTER, Deceased, Plaintiff,

s/ Thomas J. Monaghan
Thomas J. Monaghan, #12874
Rodney C. Dahlquist, Jr., #23912
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CERTIFICATE OF SERVICE

On November 7, 2024, I electronically filed the foregoing document with the Clerk of the District Court using the CM/ECF system which sent notification of such filing to the following:

Christopher A. Felts and Katharine Greenwopd, Attorney for Defendants

and I hereby certify that I have electronically served (via email) the document to the following non-CM/ECF participants:

None.

s/ Thomas J. Monaghan